

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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CREANDO LITTLE LANGUAGE EXPLORERS LLC,

Plaintiff,

v.

20-cv-1051

MONROE STREET ARTS CENTER, INC.,  
TARA VERMA,  
JAMIE GALE, and  
CREATIVE SOUL CLUB,

Defendants.

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**DEFENDANTS' MOTION TO DISMISS THE COMPLAINT FOR FAILURE TO  
STATE A CLAIM UNDER FED. R. CIV. P. 12(b)(6) AND FAILURE TO PLEAD  
WITH PARTICULARITY UNDER FED. R. CIV. P. 9(b)**

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In accordance with Fed. R. Civ. P. 12(b)(6) and 9(b), defendants Monroe Street Arts Center, Inc., Tara Verma, Jamie Gale, and Creative Soul Club (collectively, "Defendants"), by and through their undersigned counsel, move to dismiss the Complaint of plaintiff Creando Little Language Explorers LLC, in its entirety, and with prejudice. The grounds for Defendants' motion are set forth in the contemporaneously filed supporting Brief and Declaration of Seep Paliwal.

WHEREFORE, Defendants move the Court under Fed. R. Civ. P. 12(b)(6) to dismiss the Complaint in the captioned action in its entirety and with prejudice for failure to state a claim upon which relief can be granted, and under Fed. R. Civ. P. 9(b) to dismiss Claims II, IV, V, VI, and VII for failure to allege fraud or mistake with particularity the circumstances constituting fraud or mistake.

Dated: November 30, 2020

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